

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	CIVIL ACTION NO: 3:12CV59-JAG
v.)	
)	
COMMONWEALTH OF VIRGINIA,)	
)	
Defendant.)	
)	
and)	
)	
PEGGY WOOD, et al.,)	
)	
Intervenor-Defendants.)	
)	

**THE COMMONWEALTH’S COMPLIANCE CONTENTIONS AND ACTIONS TO
ACHIEVE FULL COMPLIANCE**

The Defendant, the Commonwealth of Virginia (“Commonwealth”), by counsel, in accordance with the Court’s Order dated March 12, 2019 (ECF No. 312), submits Attachment A, which contains a list of provisions of the Settlement Agreement that it believes it has met in addition to the provisions included in the Agreed Compliance List filed with the Court on April 12, 2019 (ECF No. 314), as well as the actions it has taken to comply. In addition, for provisions of the Settlement Agreement for which the United States asserts that the Commonwealth has yet to comply, Attachment A contains action steps the Commonwealth is taking or will take that it believes will achieve full compliance.

Respectfully submitted,

COMMONWEALTH OF VIRGINIA

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CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of April, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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